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9 Attorneys for Life Capital Group, LLC

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11 **UNITED STATES BANKRUPTCY COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **LOS ANGELES DIVISION**

14 In re

15 LESLIE KLEIN,

16 Debtor and Debtor in Possession.

Case No. 2:23-bk-10990-SK

Chapter 11

**DECLARATION OF KRIKOR J.
MESHEFEJIAN IN SUPPORT OF
LIFE CAPITAL GROUP'S OMNIBUS
REPLY TO
OPPOSITIONS/RESPONSES TO
MOTIONS:
(1) FOR RELIEF FROM THE
AUTOMATIC STAY; AND,
(2) FOR PAYMENT DIRECTION**

Date: May 17, 2023

Time: 8:30 a.m. + 9:00 a.m.¹

Place: Courtroom 1575

255 East Temple Street
Los Angeles, CA 90012

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28 ¹ The hearing on the Stay Relief Motion is scheduled for 8:30 a.m. and the hearing on the
Payment Direction Motion is scheduled for 9:00 a.m.

1 I, Krikor J. Meshefejian, declare as follows:

2 1. I am a partner at Levene, Neale, Bender, Yoo & Golubchik L.L.P. ("LNBYG"),
3 which was retained by Life Capital Group, LLC ("LCG") in this bankruptcy case to, among other
4 things, file: (1) a motion for relief from the automatic stay (the "Stay Relief Motion") (Doc 88);
5 and (2) a motion for an order authorizing and directing the payment of money (the "Payment
6 Direction Motion") and together with the Stay Relief Motion, the "Motions") (Doc 90).²

7 2. Ron Bender and I are the attorneys at LNBYG handling the representation of LCG.
8 Neither I nor Mr. Bender have ever provided any advice or representation to Leslie Klein, the
9 chapter 11 debtor in possession in this case (the "Debtor"). LNBYG was approached by LCG
10 after the filing of the Debtor's bankruptcy case. Prior to being retained by LCG, Mr. Bender
11 advised counsel to the Debtor that prior to the Debtor's bankruptcy filing, Daniel H. Reiss (also a
12 partner at LNBYG) provided certain limited advice to the Debtor but that LNBYG's
13 representation of the Debtor was terminated pre-petition. LNBYG concluded that it did not have
14 any conflict with becoming counsel to LCG but before becoming counsel to LCG, LNBYG
15 confirmed that the Debtor and the Debtor's current bankruptcy counsel agreed that there was no
16 conflict in LNBYG becoming counsel to LCG and that they had no objection to LNBYG
17 becoming counsel to LCG.

18 3. Before signing this Declaration, I confirmed with Mr. Reiss that LNBYG's
19 representation of the Debtor was terminated pre-petition.

20 4. Neither Mr. Bender nor I had or have any involvement with any prior
21 representation of the Debtor. Moreover, Mr. Reiss has confirmed to me that he has had no
22 involvement in LNBYG's representation of LCG.

23 5. Additionally, the payment to LNBYG that the Debtor disclosed in his Statement of
24 Financial Affairs in connection with LNBYG's prior representation of the Debtor is wholly
25 unrelated to LNBYG's representation of LCG, and the Debtor has not paid LNBYG in connection
26 with any services LNBYG has provided to LCG.

27 ² Capitalized terms not otherwise defined have the same meaning ascribed to such terms in the
28 Motions.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

3 Executed this 10th day of May, 2023, at Los Angeles, California.

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6 KRIKOR J. MESHEFEJIAN
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
2818 La Cienega Avenue, Los Angeles, California 90034

A true and correct copy of the foregoing document entitled (*specify*): **DECLARATION OF KRIKOR J. MESHEFEJIAN IN SUPPORT OF LIFE CAPITAL GROUP, LLC'S OMNIBUS REPLY TO OPPOSITIONS/RESPONSES TO MOTIONS: (1) FOR RELIEF FROM THE AUTOMATIC STAY; AND, (2) FOR PAYMENT DIRECTION** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **May 10, 2023**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- Reem J Bello rbello@goeforlaw.com, kmurphy@goeforlaw.com
- Michael Jay Berger michael.berger@bankruptcypower.com, yathida.nipha@bankruptcypower.com; michael.berger@ecf.inforuptcy.com
- Greg P Campbell ch11ecf@aldridgepite.com, gc@ecf.inforuptcy.com; gcampbell@aldridgepite.com
- Theron S Covey tcovey@raslg.com, sferry@raslg.com
- Dane W Exnowski dane.exnowski@mccalla.com, bk.ca@mccalla.com, mccallaecf@ecf.courtdrive.com
- Robert P Goe kmurphy@goeforlaw.com, rgoe@goeforlaw.com; goeforecf@gmail.com
- Brandon J Iskander biskander@goeforlaw.com, kmurphy@goeforlaw.com
- Michael Jones michael.jones4@usdoj.gov
- Ron Maroko ron.maroko@usdoj.gov
- Krikor J Meshefejian kjm@lnbyg.com
- Joshua L Scheer jscheer@scheerlawgroup.com, jscheer@ecf.courtdrive.com
- Mark M Sharf (TR) mark@sharflaw.com, C188@ecfcbis.com; sharf1000@gmail.com; 2180473420@filings.docketbird.com
- Alan G Tippie Alan.Tippie@gmlaw.com, atippie@ecf.courtdrive.com; Karen.Files@gmlaw.com, patricia.dillamar@gmlaw.com, denise.walker@gmlaw.com
- United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov
- Michael L Wachtell mwachtell@buchalter.com
- John P. Ward jward@attleseystorm.com, ezhang@attleseystorm.com
- Clarisse Young youngshumaker@smcounsel.com, levern@smcounsel.com
- Paul P Young paul@cym.law, jaclyn@cym.law

2. **SERVED BY UNITED STATES MAIL**: On (*date*) **May 10, 2023**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☐ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) **May 10, 2023**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

SERVED BY OVERNIGHT MAIL,

Honorable Sandra R. Klein
United States Bankruptcy Court
255 E. Temple Street, Suite 1582 / Courtroom 1575
Los Angeles, CA 90012

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

May 10, 2023

Lourdes Cruz

/s/ Lourdes Cruz

Date

Printed Name

Signature